

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Western District of Texas

FILED

2019 APR 22 AM 11:04

United States of America

v.

Peter Sebastian FELIX

Case No.

CLERK, US DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY

DEPUTY

EP-19-M-4414-RFC

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 04/18/2019 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 USC section 2252(a)(4)

Possession of material involving the sexual exploitation of children

18 USC section 2252(a)(2)

Receipt of material involving the sexual exploitation of children

This criminal complaint is based on these facts:

See Attached Affidavit


☒ Continued on the attached sheet.


Complainant's signature

Andrew Fyffe, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 04/22/2019

 Judge's signature
City and state: El Paso, Texas

Robert F. Castaneda-U.S. Magistrate Judge

Printed name and title

Oath Telephonically Sworn
 At 1:01 PM
 Fed.R.Crim.P.4.1(b)(2)(A)

AFFIDAVIT

In January 2019, law enforcement officers in Montgomery County, Texas encountered a sixteen (16) year old minor female (MV1) who admitted to exchanging sexually explicit images and videos with an adult male in El Paso, Texas. MV1 admitted to exchanging nude pictures and videos with a Peter Sebastian FELIX via the messaging application "Telegram".

On April 18, 2019 HSI Special Agents (SA) executed a federal search warrant at a residence in El Paso, Texas, within the Western District of Texas.

Peter Sebastian FELIX was encountered by HSI SAs inside the residence. FELIX was advised of his *Miranda* rights in the English language. FELIX acknowledged that he understood his rights and agreed to speak to investigators without an attorney present. During the interview, FELIX made the following non-verbatim statements:

FELIX agreed that a minor was anyone under eighteen (18) years of age.

FELIX stated he had a computer and cellular telephone in his room but refused to provide the passcodes for these devices. FELIX requested to have an attorney present and the interview was terminated.

Inside FELIX's bedroom HSI SAs encountered a laptop computer with labeling indicating it was assembled in China. This laptop had a USB drive and an external hard drive connected to it. HSI Computer Forensics Agents conducted an on-site forensic preview of the external hard drive and USB drive. Initial on-Site forensic preview of the external hard drive revealed approximately fifty (50) files containing suspected child sexual exploitation material. HSI SA Andrew Fyffe viewed several of the files discovered. One (1) of the files viewed is described as follows:

This file is a color image file depicting an approximately eight (8) to ten (10) year old female child. The child is seated next to a fully nude adult male. The male's face is not visible in the image. The child has the adult male's fully erect penis in her mouth. There appears to be whipped cream on the adult male's penis.

HSI Computer Forensics Agents conducted an on-site forensic preview of the USB drive. Contained within a folder bearing MV1's name were video files showing suspected child sexual exploitation of MV1. HSI SA Andrew Fyffe viewed several of the files discovered. One (1) of the files viewed is described as follows:

The file is a color video file which appears to be a screen recording of a "facetime" type video chat between FELIX and MV1. MV1 is on all fours facing away from the camera. MV1's vagina and anus are visible to the camera. MV1 masturbates and digitally penetrates her vagina throughout the screen recording. FELIX's face is visible throughout the screen recording as the other participant in the video chat.

This affidavit is being submitted for the limited purpose of establishing probable cause for the arrest of Peter Sebastian FELIX and does not set forth all my knowledge about this matter.